## IN THE DRAWINGS

Applicant submits Replacement Sheet Nos. 1-3 containing Figures 1, 2 and

4.

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## <u>REMARKS</u>

Applicant respectfully requests consideration of the subject application.

This Response is submitted in response to the Office Action mailed March 11,

2008. Claims 1-27 are pending. Claims 1-27 are rejected. In this Amendment,

claims 1 and 14 have been amended. No new matter has been added.

## **Drawings**

The Examiner requested new drawings in compliance with 37 C.F.R. 1.121(d). Applicant submits Replacement Sheets 1-3 with Figures 1, 2 and 4.

## 35 U.S.C. § 103 Rejections

The Examiner has rejected claims 1-27 under 35 U.S.C. § 103(a) as being unpatentable over Lian (U.S. Patent Publication No. 2006/0161281, hereinafter "Lian") in view of Nagura (U.S. Patent No. 6,109,797, hereinafter "Nagura"). Claim 1 has been amended with matter supported by paragraph [0028]. Similarly, claim 14 has been amended with matter supported by paragraph [0028]. Applicant submits that the claims, especially as amended, are patentable over the cited references.

Lian discloses a memory module 10 with a controller circuit 28, non-volatile memory 30 and a connector port 26 (See Figure 6 and paragraph [0019]). The memory module 10 is connectable to a battery pack 16 during a remote audio playback mode (See paragraph [0024]).

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The Examiner has relied on Nagura for a feature of a plug-jack type device 502 that couples typical USB/1394 devices as depicted in various figures, particularly Figure 11.

The Examiner has deemed that applying the cable of Nagura to Lian would result in applying a known technique to a known device leading to predictable results.

It appears that the Examiner may have misunderstood the present invention as claimed. The present invention as claimed aims to dispense with a use of the plug-jack type device 502 as disclosed in Nagura. (See paragraph [0035]). This indicates that the skilled artisan would not be induced to refer to Nagura from the onset. Thus, Nagura cannot be combined with Lian.

In addition, it is rather evident that a skilled artisan who combines features from Lian and Nagura would still not be able to conceive the claimed invention. Even if it would be possible to combine Lian and Nagura, there would be neither disclosure nor a teaching (in each document or in combination) towards a connection which enables functionality between a first audio reproduction device and a second audio reproduction device which are mutually engaged with one another. Similarly, there would be neither disclosure nor a teaching (in each document or in combination) towards an audio reproduction device with a connection which enables functionality between a first audio reproduction device and a second audio reproduction device which are mutually

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engaged with one another. Such a concept is not anticipated by the cited

documents in either form or manner.

Applicant therefore respectfully submits that claims 1 and 14 are

patentable over Lian and Nagura. The other claims depend from either claim 1

or claim 14 and should be allowable for at least the same reasons as claims 1 or

14.

Applicant, accordingly, respectfully requests withdrawal of the rejections

of claims 1-27 under 35 U.S.C. § 103(a) as being unpatentable over Lian in view of

Nagura.

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Applicant respectfully submits that the present application is in condition for allowance. If the Examiner believes a telephone conference would expedite or assist in the allowance of the present application, the Examiner is invited to call Stephen M. De Klerk at (408) 720-8300.

Please charge any shortages and credit any overages to Deposit Account No. 02-2666. Any necessary extension of time for response not already requested is hereby requested. Please charge any corresponding fee to Deposit Account No. 02-2666.

Respectfully submitted,

BLAKELY, SOKOLOFF, TAYLOR & ZAFMAN LLP

Dated: <u>June 11, 2008</u>

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